Supporting Statement Outline

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A. JUSTIFICATION

1. <u>Need for the Information Collection</u>:

- Describe the information collection activity under review.
- Explain precisely why it is necessary
- Identify any legal or administrative requirements that mandate the collection.
- Attach a copy of the relevant portions of any statutes or regulation referenced in this supporting statement.

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2. <u>Use of the Information</u>:

- How, by whom, and for what purpose the information is to be used.
- Unless this is a new collection, describe how the information has been used in the past.

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3. <u>Use of Information Technology</u>:

- Does the information collection involve the use of technological collection techniques?
- Describe any consideration given to the use of information technology in reducing the respondent burden or why its use is not appropriate to the specific collection.

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4. <u>Non-duplication</u>:

- Is there information already available which can be used, or modified for use, for the purposes of this collection? (Hopefully, NO)

5. <u>Burden on Small Business</u>:

- Discuss efforts taken to minimize the burden imposed by this collection requirements on small businesses.

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6. <u>Less Frequent Collection</u>:

- What would be the consequences if the collection were conducted less frequently?
- Are technical or legal obstacles to reducing the burden in this manner?

7. <u>Paperwork Reduction Act Guidelines</u>:

- Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2). (Hopefully NO)

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8. <u>Consultation and Public Comments</u>:

- Identify the date and page number of publication in the Federal Register of the Agency's 60-day notice (proposed or interim rule)
- Include a summary of any public comments received as a result of the 60-day Federal Register Notice.
- Address actions taken in response to those comments.
- If no comments were received, so state.

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9. <u>Gifts or Payment</u>:

- Explain any decision to provide payment or gifts to respondents, other than remuneration of contractors or grantees. (Hopefully NONE)

10. <u>Confidentiality</u>:

- Describe the extent of confidentiality inherent in the information collection.
- Address such things as protection provided against disclosure of information containing personal or organizational identifiers, disposal of completed forms or surveys, etc.

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11. <u>Sensitive Questions</u>: (Hopefully NONE)

- Provide thorough justification for any questions of a sensitive nature, such as those pertaining to sexual behavior or attitudes, religious beliefs, race and/or ethnicity, or other matters usually considered private such as the collection of the SSN. Does the question violate the Privacy Act?

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12. Respondent Burden, and its Labor Cost

a. Estimation of Respondent Burden:

- Explain how the burden estimate reported in Item 13 of the OMB Form 83-I was determined.
- Use FPDS data when available or consult with subject matter experts.

b. Labor Cost of Respondent Burden:

- Provide an estimate of annualized cost to respondents of only the burden hours imposed by the collection.
  - Estimate comparable level for a Government employee (e.g., GS-12 step 5)
  - Use Hourly rate for most recent fiscal year.
  - Multiply by the latest OMB approved fringe benefit rate (about 32.85%)

13. <u>Respondent Costs Other Than Burden Hour Costs</u>:

Provide an estimate of annualized costs to respondents, other than the burden hour costs addressed in Item 12, resulting from the collection of information. This item expands upon the entries in Item 14 of OMB Form 83-I. Break this item into two components:

a. Total capital and start-up costs annualized over the expected useful life of the item(s).

b. Total Operation and Maintenance Costs

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14. <u>Cost to the Federal Government</u>: Annualize the costs incurred by the Federal Government in collecting and processing the information collected, and explain the methods used in determining these estimates.

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15. <u>Reasons for Change in Burden</u>:

- Briefly explain the reason for change in burden, if any, as indicated in Item 13 of OMB Form 83-I.
- Changes due to a new regulation or a change in a current regulation are Program Changes

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16. Publishing collection results

17. Non-Display of OMB Expiration Date

18. Exceptions to "Certification for Paperwork Reduction Submissions"

All hopefully NOT